Exhibit A

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,	§	
	§	
Plaintiffs,	§	
v.	§	CIVIL ACTION NO. 2:13-CV-00193
	§	
GREG ABBOTT, *et al.*,	§	
	§	
Defendants.	§	

DECLARATION OF KEITH INGRAM

My name is Keith Ingram and I am over the age of 18 and fully competent to make this declaration, and state the following:

1.   I am the Director of Elections for the Texas Secretary of State. The Secretary of State is the chief election officer of Texas. *See* TEX. ELEC. CODE § 31.001. As the Director of Elections, I supervise the Secretary of State's Election Division. The Election Division's primary responsibility is ensuring that the Secretary of State discharges all of his duties under the Texas Election Code.

2.   Section 14.001 of the Texas Election Code requires the voter registrar to "issue a voter registration certificate to each voter in the county whose registration is effective on the preceding November 14 and whose name does not appear on the suspense list" on or before November 15, 2017 but before December 6, 2017. TEX. ELEC. CODE § 14.001(a). The Secretary of State prescribes the form and language contained in the certificate, but the counties print and mail the certificate to registered voters. The Secretary of State is required to include the operative

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voter-ID rules on each voter registration certificate to ensure that voters have clear notice of the requirements. *See* TEX. ELEC. CODE § 15.005. Although the court's August 23 order enjoins the requirements contained in Section 15.005 of the Texas Election Code, the Secretary of State must include other language on the back of the voter registration code pursuant to other statutory obligations. *See, e.g.,* TEX. ELEC. CODE §§ 15.001(a), 15.002(a). In order for the counties to complete the mass mailout of voter registration certificates, the Secretary of State must adhere to certain deadlines.

3.   In my capacity as the Director of Elections, I am responsible for approving the language that appears on the back of the voter registration certificate. The agency's internal deadline to finalize the language on the back of the certificate was August 30. We set that internal deadline, because the cards have to be printer-ready to create a sample production on September 18. But between those two dates, the agency needs to translate the language contained on the certificate into Spanish, identify any changes that are needed, and do a final review. This process typically takes us about 18 days. However, if we work on an expedited basis as fast as possible, we could perform the translation and those final reviews and still have the certificates to the printer by September 18 if a court definitively clarified which voter-ID laws will be in place for the 2018 election cycle by September 14.

4.   The Secretary of State intends to issue a directive to the counties on October 2 regarding the mass mailout of voter registration certificates. Beginning in

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August and through the end of October, counties order certificate supplies from printers for use in the mass mailout. On November 1, the counties will begin printing the certificates. The certificates are mailed beginning on November 22. By December 6, the counties are statutorily required to have mailed all voter registration certificates. *See* TEX. ELEC. CODE § 14.001(a).

5.   On or after the start of the 2018 fiscal year, which begins September 1, the Secretary of State intends to seek to procure vendor services to assist the State with voter education for the November 2017 election. Early voting for this election begins on October 23. As a result, in order to procure a vendor and allow the vendor sufficient time to create and implement an education campaign, the State needs to know which election procedures will be used for the upcoming election by September 14.

6.   All of the facts and information contained within this declaration are within my personal knowledge and are true and correct.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this the 24th day of August, 2017.

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KEITH INGRAM

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